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April 21, 2015

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Karen Alameddene,*
14 Cr. 808 (GHW)

Dear Judge Woods:

This letter is submitted on behalf of Karen Alameddene, defendant in the above-entitled case, and whom I represent by CJA appointment. The next pretrial conference in this case is scheduled for tomorrow, Wednesday, April 22, 2015, at 10:30 a.m. However, for the reasons set forth below, it is respectfully requested that the pretrial conference be adjourned until Thursday, April 30, 2015, at 2:30 p.m., at which time it is anticipated Ms. Alameddene will withdraw her plea of not guilty and enter a plea of guilty. I have spoken with Assistant United States Attorney Stanley J. Okula, Jr., and he has informed me that the government does not object to this request.

The request for an adjournment of the pretrial conference is based on the continuing negotiations between the parties in an effort to reach a resolution in this matter. Certain specific details of a proposed plea agreement have not yet been finalized, and the parties expect that process will be completed by April 30th. As a result, it is respectfully submitted that postponing the conference for two weeks would present a more efficient use of the Court's and counsel's resources.

In addition, I have been informed by AUSA Okula that should the Court grant the request

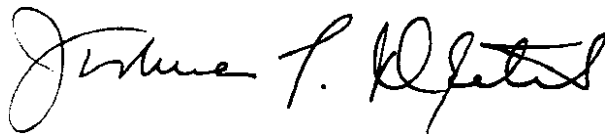
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for the adjournment of the pretrial conference, the government requests that for purposes of the Speedy Trial clock, the intervening time between April 22, 2015, and April 30, 2015, be excluded. The continuing negotiations toward a disposition of this case warrant exclusion of the time from the Speedy Trial calculation. Ms. Alameddene consents to the exclusion of time. A proposed Order regarding the exclusion is being e-mailed to the Court concurrent with the filing of this application.

Accordingly, it is respectfully requested that the Court adjourn the pretrial conference scheduled for April 22, 2015, until April 30, 2015, at 2:30 p.m.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/

cc: Stanley J. Okula, Jr.
Assistant United States Attorney